

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

ARTHUR MONIQUE HARRIS,

Plaintiff,

v.

THE SALVATION ARMY,

Defendant.

COMPLAINT
{Jury Trial Demanded}

Plaintiff ARTHUR MONIQUE HARRIS (“Harris”) brings this action against Defendant THE SALVATION ARMY (“SA”) and alleges as follows:

1. This is an action arising under the Fair Labor Standards Act 29 U.S.C. §§ 201-219 (“FLSA”). Jurisdiction is conferred on this Court by 28 U.S.C. § 1331 and 29 U.S.C. § 216(b).
2. At all times material hereto, Plaintiff was a resident of Florida and an “employee” of Defendant as defined by the FLSA.
3. At all times material hereto, SA was designated with Florida as a “Foreign Not For Profit Corporation” and regularly transacted business in Broward County, Florida.
4. Upon information and belief, SA’s gross sales or business generated was over \$500,000 per year at all times material hereto.
5. SA has employees handling, selling, or otherwise working on goods or materials that were moved in or produced for commerce, including but not limited to computers, phones, pens, and paper.

6. SA was an enterprise engaged in commerce or the production of goods for commerce and is covered by the FLSA at all times material hereto.
7. SA is a business engaged in operating thrift stores.
8. Harris worked for Defendant as a warehouse laborer.
9. Defendant failed to pay Harris's full and proper minimum wages.
10. Defendant failed to pay Harris's full and proper overtime wages.
11. Defendant knowingly and willfully refused to pay Plaintiff's legally-entitled wages.
12. Attached as **Exhibit A** is a preliminary calculation of Harris's claims, including date ranges, hours worked, rates of pay, and unpaid wages; these amounts may change as Plaintiff engages in the discovery process.
13. Plaintiff retained the services of the undersigned and is obligated to pay for the legal services provided.

COUNT I
VIOLATION OF THE FAIR LABOR STANDARDS ACT

14. Plaintiff realleges and incorporates the allegations set forth in paragraphs 1-13 above as if set forth herein in full.
15. Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), Plaintiff is entitled to (i) unpaid minimum wages, (ii) time-and-a-half overtime pay, and (iii) liquidated damages.
16. Plaintiff seeks recovery of damages as referenced above and further seeks interest, costs, and attorneys' fees pursuant to 29 U.S.C. § 216(b).

WHEREFORE, Plaintiff demands judgment against Defendant, plus costs, reasonable attorneys' fees, and such other remedy as the court deems just and appropriate.

Respectfully submitted,

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